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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her guardian *ad litem* Maria Cadena, individually and as successor-in-interest to Hector Puga; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez, individually and as successor-in-interest to Hector Puga; A.L., a minor by and through her guardian *ad litem* Lydia Lopez, individually and as successor-in-interest to Hector Puga; and ANTONIA SALAS UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF SAN BERNARDINO; S.S.C., a nominal defendant; ISAAH KEE; MICHAEL BLACKWOOD; BERNARDO RUBALCAVA; ROBERT VACCARI; JAKE ADAMS; and DOES 6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

**STIPULATION AND REQUEST
FOR ORDER CONTINUING THE
DEADLINE TO FILE CERTAIN
PRETRIAL DOCUMENTS FROM
MAY 1, 2025 TO MAY 8, 2025**

1 **TO THE HONORABLE COURT:**

2 Plaintiffs L.C., a minor by and through her guardian *ad litem* Maria Cadena;
3 I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez; A.L., a
4 minor by and through her guardian *ad litem* Lydia Lopez; and Antonia Salas Ubaldo
5 (“Plaintiffs”) and Defendants State of California, by and through the California
6 Highway Patrol, Michael Blackwood, Isaiah Kee, Bernardo Rubalcava (“State
7 Defendants”), County of San Bernardino, Robert Vaccari, and Jake Adams
8 (“County Defendants”) (collectively “Defendants”), hereby stipulate for the purpose
9 of requesting that the Court issue an order continuing the deadline to file certain
10 pretrial documents from May 1, 2025 to May 8, 2025.

11 1. On April 1, 2025, the Parties participated in a mediation before ADR
12 Panel Mediator Richard Copeland pursuant to ADR Procedure No. 2. Plaintiffs and
13 County Defendant reached a tentative settlement, subject to County Board approval
14 and Court approval of the minors’ compromise of claims. The matter was set for
15 review by the Board of Supervisors at the next available closed session meeting on
16 April 29, 2025.

17 2. During the interim, the Parties have been working diligently to
18 complete the pretrial documents and file them pursuant to the Court’s Civil Trial
19 Scheduling Order.

20 3. On April 29, 2025, the San Bernardino County Board of Supervisors
21 approved the settlement between Plaintiffs and County Defendants.

22 4. On April 30, 2025, pursuant to the Courts’s April 28, 2025 Order,
23 Plaintiffs filed a Status Report Regarding County Board Approval of Plaintiffs’
24 Settlement with County Defendants. [Doc. No. 168.] Plaintiffs and County
25 Defendants are currently working on drafting and finalizing the Settlement
26 Agreement. A formal Notice of Settlement will be filed once Plaintiffs and County
27 Defendants finalize and execute the Settlement Agreement.

1 5. Pursuant to the Court's Civil Trial Scheduling Order and the Final
2 Pretrial Conference date of May 15, 2025, the following pretrial documents are due
3 on May 1, 2025: Proposed Final Pretrial Conference Order, Stipulation of Facts,
4 Joint Exhibit Stipulation, Proposed Jury Instructions and objections, Proposed
5 Verdict Form(s), Joint Statement of the Case, and Proposed Voir Dire Questions.

6 6. Since a settlement has been reached between Plaintiffs and County
7 Defendants, Plaintiffs and State Defendants will need to revise the current drafts of
8 the pretrial documents above in order to reflect that County Defendants will no
9 longer be involved in the case and at trial as defendants.

10 7. Additionally, counsel for State Defendants is currently out of the
11 country and has limited internet connection and has been unable to access her work
12 email.

13 8. Accordingly, in order to give Plaintiffs and State Defendants time to
14 revise the pretrial documents to reflect the settlement between Plaintiffs and County
15 Defendants, and in light of State Defendants' counsel's limited access to the internet
16 and emails, the Parties hereby stipulate that good cause exists for the continuance of
17 the filing deadline of the following pretrial documents **from May 1, 2025 to May 8,**
18 **2025:** Proposed Final Pretrial Conference Order, Stipulation of Facts, Joint Exhibit
19 Stipulation, Proposed Jury Instructions and objections, Proposed Verdict Form(s),
20 Joint Statement of the Case, and Proposed Voir Dire Questions. The Parties
21 respectfully request that the Court grant the Parties' request and issue an order
22 continuing the pretrial deadline for the above pretrial documents **from May 1, 2025**
23 **to May 8, 2025.**

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1 **IT IS SO STIPULATED.**

2 DATED: May 1, 2025

LAW OFFICES OF DALE K. GALIPO

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Bv /s/ *Hang D. Le*
Dale K. Galipo
Hang D. Le
Attorneys for Plaintiffs

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9 DATED: May 1, 2025

ROB BONTA
Attorney General of California
NORMAN D. MORRISON
Supervising Deputy Attorney General

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/s/ Diana Esquivel

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DIANA ESQUIVEL
Deputy Attorney General
*Attorneys for Defendant State of Cal., by and
through the CHP, Blackwood, Kee, and
Rubalcava*

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DATED: May 1, 2025

LYNBERG & WATKINS

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Bv /s/ *Shannon L. Gustafson*
Shannon L. Gustafson
Amy R. Margolies
Attorneys for Defendants
COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, and JAKE ADAMS

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25 *The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose
26 behalf the filing is submitted, concur with the filing's content and have authorized
27 the filing.

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